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**AFFIDAVIT**

I, Michael J. Connelly, being duly sworn, depose and state the following:

1. I am an Inspector with the United States Postal Inspection Service (USPIS) assigned to the Boston Division, in Boston, MA, having been so employed since 2007. As a Postal Inspector, I am responsible for the investigation of federal criminal offenses involving the transportation, distribution, receipt, and sale of child pornography through United States mail and related sexual offenses in violation of Title 18, United States Code, §§ 2252, 2252A, and 2422. I have completed the USPIS Basic Inspector Training (BIT) program in Potomac, MD and have conducted and assisted in numerous investigations into the violation of both state and federal laws involving child pornography and other child sexual exploitation offenses. I am also an affiliate member of the Rhode Island Internet Crimes Against Children (ICAC) Taskforce and routinely work with agents, troopers, and officers with dozens of years of experience investigating crimes involving the sexual exploitation of children. I have received specialized training in the investigation of crimes involving the sexual exploitation of children by attending both seminars and courses. I have investigated child pornography cases and related sexual offenses on a full time basis since approximately May 2011.

2. I make this affidavit in support of an application for a criminal complaint against Robert Joseph Rang, (Rang,) age 25, year of birth 1989, of Coaldale, Pennsylvania, charging Rang with a violation of 18 United States Code, § 2422(b), which makes it illegal for any person to use the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense and to attempt to do so.

3. The information contained in this affidavit is based on an investigation conducted by me and information obtained by this affiant from other law enforcement agents involved in this investigation.

4. This affidavit is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint and arrest warrant. In submitting this affidavit, I have attempted to summarize the most relevant facts that establish the requisite probable cause. Therefore, I have not included each and every fact of this investigation. Additionally, where conversations or statements are related herein, they are set forth in substance and in pertinent part.

**THE INVESTIGATION**

5. On October 29, 2014, a woman in Massachusetts contacted her local police department to report that her nine (9) year old grandchild, with whom she lived, had been



in contact with an adult male via Sony PlayStation<sup>1</sup> and text messaging and that the adult had requested the nine-year-old to engage in sexually explicit conduct. The nine year old child will be referred to in the affidavit as “minor child” to protect his/her identity. The minor child’s grandmother will be referred to as “grandmother” to protect the minor victim’s identity. The grandmother told the local police that the minor victim met an adult male known as ROBERT RANG (“RANG”) while playing an Internet video game and the two had become “friends” during the summer.

6. The grandmother stated that on October 28, 2014, at approximately 11:00 p.m., she overheard the minor victim’s iPod receiving numerous text messages. The grandmother reviewed the messages, saw that they were sexual in nature, and became very alarmed. According to the grandmother, in one of the messages, RANG asked the minor victim to “masturbate” with him and to send him “naked pictures.”

7. The grandmother also informed the local police that from her conversations with the minor victim she learned that RANG was friends with other children on-line and that RANG had put “money/time” on the Sony Play Station account of the minor victim and on the accounts of the other children he had befriended on-line.

8. The grandmother further reported that RANG called her residence to speak with the minor victim. The grandmother stated the call showed up on her caller ID as (xxx) xxx-7842<sup>2</sup>. The grandmother answered the phone and spoke with RANG. The grandmother asked RANG why he was calling the minor victim and RANG stated that he and the minor victim were friends on-line. The grandmother told RANG not to contact the minor victim again and the conversation ended.

9. On October 29, 2014, local law enforcement conducted a preliminary interview with the minor victim with the grandmother’s permission. The minor victim told law enforcement that he has been playing Sony PlayStation on-line with a man named ROBERT RANG. The minor victim stated he thought RANG lived in Pennsylvania. The minor victim said RANG worked for PlayStation and RANG was 25-years-old. The minor victim stated most of the conversations with RANG were conducted through the headset while playing on-line games. The minor victim said he did not recall the conversations with RANG.

10. The minor victim stated he had some messages RANG sent him on his PlayStation. The minor victim’s grandmother provided law enforcement consent to view the messages saved on the PlayStation. The following messages were sent from “rrang10,” which the minor identified as RANG, to the minor victim:

*July 10, 2014, “how much i trust u today i trust you 94%”*

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<sup>1</sup> The following definition was taken from Wikipedia: PlayStation is a series of video game consoles created and developed by Sony Computer Entertainment. The brand was first introduced on December 3, 1994 in Japan with the launch of the original PlayStation console. It now consists of four home consoles, as well as a media center, an online service, a line of controllers, two handhelds and a phone, as well as multiple magazines.

<sup>2</sup> A subpoena was issued to Verizon Wireless and the subscriber of this number was identified as Robert Rang.



*October 1, 2014, "here is my new phone number save this message don't ever delete it the number is 570-449-7842 thanks before babe i love you so much [two pictograms-smiley face with hearts and large heart with 2 small heart] call me when ever you want and can"*

11. On October 31, 2014, law enforcement had further conversation with the grandmother and she explained that her daughter, who is the minor victim's mother, was currently incarcerated at a state correctional facility in Massachusetts. The grandmother stated that the minor victim's mother told her that she received money and a couple of letters from RANG at the correctional facility. The grandmother stated that RANG allegedly said he wanted to meet with the minor victim's mother and the minor victim in person when the minor victim's mother got out of prison.

12. Law enforcement secured the Sony PlayStation used by the minor victim, bearing serial number xxxxxxxxxxx-xxxx-2501A.

13. On October 31, 2014, shortly after law enforcement left the residence shared by the grandmother and the minor victim, RANG called the residence. The grandmother reported the RANG asked why the minor victim was ignoring him. The grandmother indicated she did not disclose the existence of this investigation before terminating the phone call with RANG.

14. On August 28, 2014, the minor victim's grandmother and the minor victim provided law enforcement with consent to view and analyze the contents of the minor victim's IPOD bearing serial number xxxxxxxY201. The review revealed that in the contact section of the minor victim's iPod the name ROBERT RANG appeared with a mobile number listed as (xxx) xxx-7842.

15. A review of text messages sent by RANG to the minor victim on October 26, 2014, revealed that RANG texted, among other statements:

*I love u*

*I really want to play with u so bad we havent really played since last thursday its upsetting me really bad*

*It hurts me when we dont play i really want to play with the one i love i deleted my real life friend off ps3 as well now now its only me and u*

*and*

*All i think about is u all day ur the first person i think of when i get up and the last person i think about before i go to sleep*

16. A review of text messages sent by RANG to the minor victim between October 27, 2014 and October 29, 2014, revealed that RANG texted, among other statements,



*Omg i love u so much ur making my dick ao hard...*

*Can we masturbate babe im so hard we can do it super super fast if not its ok...*

*Ok and its ok i understand u dont want to its ok not mad ill do it later by myself i wish i had a few pics of u naked...*

*Hey text me when u get on tomorrow please i want to play with u i had a great night babe i really do love u more then life itself u make me so happy... ur the love of my life and i never want to lose what we have are love is so strong that when we dont talk for one day i get worried about u because i car...*

*e that much i love u [VICTIM NAME ] forever and always we have true love.*

17. On November 12, 2014, a subsequent interview was conducted with the minor victim. The minor victim stated the friendship with RANG started about a year ago and that they first meet on PlayStation while playing video games named Minecraft and Call of Duty. The minor victim reported the screen name on PlayStation "rrang10" is ROBERT RANG. The minor victim stated RANG would chat with him using the headset from the PlayStation. The minor victim explained that PlayStation is connected to the Internet and allows people to chat on PlayStation over the headsets. RANG told the minor victim he was 25-years-old and lived in Pennsylvania.

18. The minor victim reported RANG sent gift cards online through PlayStation for points to make game related purchases. The minor victim recalled a gift card for about \$50, which the minor victim used to purchase a game called "GTA 5" (Grand Theft Auto 5). The minor victim reported that he told RANG he was nine (9) years old and in the 4<sup>th</sup> grade. The minor victim also stated RANG saw pictures of the minor victim on Facebook. The minor victim reported RANG was also talking with a couple of the minor victim's friends.

19. The minor victim stated RANG asked him for pictures. When the minor victim was asked what type of pictures RANG asked for, the minor victim stated "bad ones." The minor victim appeared embarrassed to define a bad picture. Law enforcement asked the minor victim if he would feel better to point to the area on a drawing. The minor victim agreed and circled the groin area on a drawing made by law enforcement. The minor victim stated RANG asked for pictures of him naked on more than five occasions. The minor victim stated RANG asked for images of his "private parts." The minor victim denied sending any images to RANG.

20. The minor victim stated RANG had asked him to masturbate with him while on the phone and while chatting on PlayStation on more than fifteen (15) occasions. The minor victim acknowledged that he thought RANG was masturbating during their conversations due to RANG'S "heavy breathing and you could hear him." The minor victim stated that he asked RANG if he was touching himself and RANG replied "yes." The minor victim explained that masturbation involved touching your penis.





21. The minor victim said RANG stated he worked for Sony PlayStation and that this gives RANG the login information for all users. Also, RANG told the minor victim he worked at a restaurant. The minor victim said he spoke with RANG on the telephone about "ten or eleven" times.

22. The minor victim was shown a sample of the text conversation noted above in paragraph 16. The minor victim said RANG told him to download the Textnow.com<sup>3</sup> application so they could communicate by text messaging.

23. On Friday, November 7, 2014, law enforcement interviewed the minor victim's mother regarding the enticement investigation involving her nine (9) year old son. She stated RANG would call her cell phone and believed RANG got her cell phone number online because it had been posted on her Facebook profile. She also stated RANG called the house phone and believed he got that phone number from her son. She further told law enforcement that she had received several letters and money from RANG. She described one of the letters mentioned RANG'S plan to have a "sleepover" with her and the minor victim.

24. The victim's mother provided consent and signed USPIS consent to search forms, authorizing law enforcement to search her Facebook account and the Facebook account used by the minor victim.

25. Law enforcement reviewed the contents of the minor victim's mother's Facebook account and saw a Facebook friend request from a "RANG ROBERT."

26. The victim's mother provided law enforcement several letters from RANG addressed to her while incarcerated at a Massachusetts correctional facility. The letters were addressed to victim's mother with a return name and address in the upper left corner of Robert Rang, 143 2<sup>nd</sup> St, Coaldale, PA 18218. The letters had all been post marked from Lehigh Valley, PA in September, October and November 2014.

27. A letter dated September 19, 2014, contained the following:

*I have a question when I come there in June I'm going to be bringing my PS# with me to the hotel. I've told VICTIM about it already so he asked me if he could hang out with me one night while I'm out there and we could play PS3 all night*

*I said to him maybe your mom will let you if you continue being good and you try your best in school then maybe she will let us have a "sleep over"  
LOL*

28. The letter dated October 6, 2014, contained the following:

*Im dealing with tickets for running a stop sign and speeding  
My # is XXX-XXX-34*

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<sup>3</sup> According to Textnow.com website: Download Textnow for free! No catch here! Download our free app to experience free calling and texting on any device you want!




29. On December 29, 2014, I assisted by other federal and state law enforcement officers executed a federal search warrant, issued by the US District Court for the Middle District of Pennsylvania, on the premises located at 143 2<sup>nd</sup> Street, Coaldale, Schuylkill County, Pennsylvania. During this search warrant, which included all electronic media and storage devices, agents located on Rang's cell phone, which contained several images of naked prepubescent males lasciviously exhibiting their exposed genital area, which, in my opinion, constitutes child pornography as defined by Title 18, U.S.C. § 2256. The forensics on the cell phone are not complete at this time. Rang stated that he is the only one that knows the password to the phone. Agents also found contact information for the 9-year-old victim and the 9-year-old victim's mother in Rang's cell phone. Agents also found a handwritten notebook in Rang's bedroom with the minor victim's phone number, name, and other contact information, and notes that indicate that Rang is paying for the minor victim's online gaming subscription.

30. On December 29, 2014, Postal Inspectors conducted an interview of suspect Robert Rang, after he was advised of and waived his Miranda rights. During this interview, Rang admitted that he had an online relationship with a 9-year-old boy from Massachusetts, that he chatted online and texted with the 9-year-old boy, that he was sexually attracted to the 9-year-old boy, and that he asked the 9-year-old boy to send him naked pictures of himself. Rang has a prior conviction for corruption of minors in Schuylkill County (2012) and is a registered sex offender.

### CONCLUSION

31. Based on the aforementioned factual information, I respectfully submits there is probable cause to believe that in the District of Massachusetts and elsewhere, Robert Joseph Rang did knowingly and willingly use a facility of interstate commerce to persuade, entice, and induce, and attempt to persuade, entice and induce a minor to engage in sexual activity for which any person can be charged with a criminal offense in violation of 18 U.S.C. § 2422(b).

  
Michael J. Connelly  
United States Postal Inspector

Sworn and subscribed to before me this 30<sup>th</sup> day of December, 2014.

  
HON. M. PAGE KELLEY  
U.S. Magistrate Judge



